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8 Attorney for Debtor
9 Randall and Christina Wanser

10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 Randall and Christina Wanser

13 Debtor

14)
15) Case No.: 09-47635
16)
17) Chapter: 11
18)
19)
20) NOTICE OF MOTION TO AVOID LIEN
21) (SECOND DEEDS OF TRUST) AND TO
22) VALUE COLLATERAL OF CREDITOR
23) HANSEN PROPERTIES LLC ON REAL
24) PROPERTY AND OPPORTUNITY FOR
25) HEARING
26)

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17 TO HANSEN PROPERTIES LLC AND THEIR ATTORNEY OF RECORD:

18 PLEASE TAKE NOTICE that Debtor Randall and Christina Wanser
19 will and hereby do move the court for an Order avoiding your lien on the real property
20 commonly known as 3146 Diablo View Road , Lafayette CA 94549 (“Real Property”) and
21 making the determination that the claims based on these liens are totally unsecured in their
22 Chapter 11 case.

23 The motion is being brought pursuant to 11 USC section 506(a) and Federal Rules of
24 Bankruptcy Procedure 3012.
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26 NOTICE OF MOTION TO AVOID LIEN (SECOND DEED OF TRUST) AND VALUE COLLATERAL OF CREDITOR
HANSEN PROPERTIES LLC AND OPPORTUNITY FOR HEARING

1 This matter is governed by Bankruptcy Local Rule 9014-1(b)(3). You have twenty (20)
2 days from the date of this Notice for you to request a hearing on the Motion. Any such request
3 must be filed with the court and served upon the initiating party and the United States Trustee,
4 and be accompanied by any declarations and memorandum of law the requesting party wishes to
5 present in support of their position. If a request for hearing is timely made, the initiating party
6 shall timely set the matter for hearing and give at least ten (10) days notice of the hearing to the
7 requesting party. If the request for hearing is not timely made, the court may enter an Order
8 approving the motion by default.
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10 Dated: September2, 2009

/s/ Darya S. Druch

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12 Darya S. Druch
13 Attorney for Debtor In Possession
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NOTICE OF MOTION TO AVOID LIEN (SECOND DEED OF TRUST) AND VALUE COLLATERAL OF CREDITOR
HANSEN PROPERTIES LLC AND OPPORTUNITY FOR HEARING